

1 Zachary M. Best, SBN 166035
2 MISSION LAW FIRM, A.P.C.
3 332 North Second Street
4 San Jose, California 95112
5 Telephone (408) 298-2000
6 Facsimile (408) 298-6046
7 E-mail: service@mission.legal

5 Attorney for Plaintiff,
Francisca Moralez

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

10 FRANCISCA MORALEZ,) No. . 4:17-cv-05128-KAW
11 Plaintiff,)
12 vs.) **SECOND STIPULATION TO EXTEND
13 WOMAR, INCORPORATED dba CARL'S) DEADLINE TO COMPLETE JOINT SITE
14 JR.; CENTURY PLAZA CORPORATION;) INSPECTION REQUIRED BY GENERAL
15 Defendants.) ORDER 56; [PROPOSED] ORDER
16)
17)
18 _____)**

1 Plaintiff, Francisca Moralez (“Plaintiff”), and Defendants, Womar, Incorporated dba
2 Carl’s Jr., and Century Plaza Corporation (“Defendants,” and together with Plaintiff, “the
3 Parties”), by and through their respective counsel, hereby stipulate as follows:

4 1. This action arises out of Plaintiff’s claims that Defendants denied her full and
5 equal access to their public accommodation on account of her disabilities in violation of Title
6 III of the Americans with Disabilities Act (“ADA”) and parallel California law. Plaintiff seeks
7 injunctive relief under federal and California law, as well as damages under California law.
8 This matter therefore proceeds under this district’s General Order 56 which governs ADA
9 access matters.

10 2. The Court ordered the Parties to conduct a joint site inspection of the subject
11 property on or before December 15, 2017 (Dkt. 4), and thereafter, the parties were granted an
12 extension to conduct the inspection on January 29, 2018 (Dkt. 12).

13 3. The Parties are engaging in settlement discussions and wish to avoid incurring
14 additional attorney’s fees and costs incident to attending the joint site inspection while
15 settlement efforts are being exhausted. The Parties appear to be near settlement.

16 4. The Parties have agreed to conduct the joint site inspection on February 12, 2018
17 at 10:30 a.m. unless a settlement is reached prior to that date.

18 5. Accordingly, the Parties stipulate to extend the deadline to conduct the joint site
19 inspection to February 12, 2018.

20
21 **IT IS SO STIPULATED.**

22
23 Dated: January 29, 2018

MISSION LAW FIRM, A.P.C.

24
25 */s/ Zachary M. Best* _____
26 Zachary M. Best
27 Attorney for Plaintiff,
Francisca Moralez

28 ///

SECOND STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION
REQUIRED BY GENERAL ORDER 56; [PROPOSED] ORDER

1 Dated: January 29, 2018

LAW OFFICE OF MICHELLE LEU ZACCONE

3 */s/ Michelle Leu Zaccoone* _____

4 Michelle Leu Zaccoone
5 Attorneys for Defendants
6 Womar, Incorporated dba Carl's Jr. and
Century Plaza Corporation

7 **ATTESTATION**

8 Concurrence in the filing of this document has been obtained from each of the individual(s)
9 whose electronic signature is attributed above.

10 */s/ Zachary M. Best* _____

11 Zachary M. Best
12 Attorney for Plaintiff,
Francisca Moralez

13 **ORDER**

14 The Parties having so stipulated and good cause appearing,

15 **IT IS HEREBY ORDERED** that the deadline for the Parties to complete the joint site
16 inspection is extended to February 12, 2018, with all dates triggered by that deadline continued
17 accordingly.

18 **IT IS SO ORDERED.**

19
20 Dated: 1/30/18

21
22 
23 United States Magistrate Judge

24
25
26
27
28
SECOND STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION
REQUIRED BY GENERAL ORDER 56; [PROPOSED] ORDER